

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: JUUL LABS, INC. MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

THIS DOCUMENT RELATES TO:

Ashlynn Nessmith,

Plaintiffs,

v.

JUUL Labs, Inc., Altria Group, Inc., Philip  
Morris USA, Inc., Altria Client Services,  
Altria Group Distribution Company, Altria  
Enterprises LLC, James Monsees, Adam  
Bowen, Nicholas Pritzker, Hoyoung Huh,  
and Riaz Valani,

Defendants.

**DECLARATION OF SARAH J.  
FOSTER IN SUPPORT OF  
PLAINTIFF'S MOTION TO  
SUBSTITUTE PARTIES AND FOR  
LEAVE TO FILE THE PROPOSED  
AMENDED COMPLAINT**

I, Sarah J. Foster, declare as follows:

1. I am an attorney duly licensed to practice law in the state of Florida. I am an attorney at the law firm of Schlesinger Law Offices, P.A. I submit this declaration in support of Plaintiff's Motion to Substitute Parties and for Leave to File the Proposed Amended Complaint.

I have personal knowledge of the matters stated below, and if called upon to do so, I could and would competently testify as stated therein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Suggestion of Death Upon the Record filed on September 13, 2024.

3. Attached hereto as **Exhibit B** is a true and correct copy of the Order Appointing Erin Nessmith and Jared Nessmith as Personal Representatives of the Estate of Ashlynn Nessmith entered on October 2, 2024.

4. Attached hereto as **Exhibit C** is a true and correct copy of the Proposed Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on October 25, 2024 in Fort Lauderdale, Florida.

DATED: October 25, 2024

Respectfully submitted,

/s/ Sarah J. Foster

Sarah J. Foster